

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

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UNITED STATES OF AMERICA :  
 :  
- v. - :  
KUN SHAN CHUN, :  
a/k/a "Joey Chun," :  
 :  
Defendant. :  
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INFORMATION  
**16 CRIM 518**

COUNT ONE

The United States Attorney charges:


1. From in or about 2011, up to and including on or about March 16, 2016, in the Southern District of New York and elsewhere, KUN SHAN CHUN, a/k/a "Joey Chun," the defendant, not being a diplomatic or consular officer or attaché, did knowingly act in the United States as an agent of a foreign government without prior notification to the Attorney General, as required by law, to wit, while acting in the United States at the direction of one or more officials of the People's Republic of China, and during the course of CHUN's employment at the Federal Bureau of Investigation ("FBI"), CHUN collected sensitive

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DATE FILED: **AUG 01 2016**

JUDGE MARRERO

information from the FBI for transmittal to one or more Chinese government officials without previously notifying the Attorney General.

(Title 18, United States Code, Section 951.)

  
PREET BHARARA  
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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Defendant.

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INFORMATION

16 Cr.

(18 U.S.C. § 951.)

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PREET BHARARA  
United States Attorney.

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8/1/16 - Filed Information.  
cc Filed Waiver of Indictment  
Francis  
USMJ